

quinn emanuel trial lawyers | new york

51 Madison Avenue, 22nd Floor, New York, NY 10010 | TEL (212)-849-7000

WRITER'S DIAL NO.

(212) 849-7000

WRITER'S EMAIL ADDRESS

courtneywhang@quinnemanuel.com

October 18, 2024

Hon. Jesse M. Furman
United States District Court
40 Centre Street, Room 2202
New York, NY 10007

Re: *ChemImage Corp. v. Johnson & Johnson et al.*, No. 1:24-CV-2646 (JMF)
Letter Motion For Leave to Seal

Dear Judge Furman:

On behalf of Plaintiff ChemImage Corporation ("ChemImage"), we write pursuant to Federal Rule of Civil Procedure 5.2(d), this Court's Standing Order 19-MC-583, and Rule 7.C of the Court's Individual Rules and Practices in Civil Cases to respectfully seek leave to seal (i) Plaintiff ChemImage's Letter Motion to Compel Defendants' to Produce an Adequately Prepared 30(b)(6) Witness, and (ii) exhibits D and E attached thereto. A redacted, public version of ChemImage's letter motion is being filed contemporaneously herewith.

ChemImage's Motion quotes from and attaches two confidential deposition transcripts generated in the course of this litigation (Exs. D and E). These documents were designated confidential by counsel for Defendants and are therefore required to be filed under seal pursuant to the parties' Protective Order, ECF No. 56. ChemImage conferred with Defendants on October 18, 2024 as required by Rule 7.C of the Court's Individual Rules and Practices and Defendants requested that ChemImage file the exhibits under seal and redact any quotes from ChemImage's public filing.

We thank the Court for its consideration.

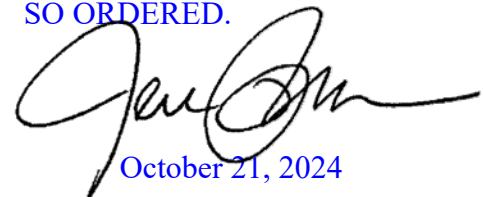
Respectfully submitted,

/s/ Courtney C. Whang

Courtney C. Whang

The motion to seal is granted temporarily. The Court will assess whether to keep the materials at issue sealed or redacted when deciding the underlying motion. The Clerk of Court is directed to terminate ECF No. 96.

SO ORDERED.



October 21, 2024